

## Jump, Christine

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**From:** Michael Stephenson <mstephenson@cameron-cole.com>  
**Sent:** Thursday, April 30, 2015 2:38 PM  
**To:** Jump, Christine  
**Cc:** SMITH, MARTIN L; Akhter Hossain; Mostafa Kamal; John Cook; STEWART, LON R  
**Subject:** Q1 2015 Quarterly Status report for Clean Harbors Wichita  
**Attachments:** Q1 2015 Progress Report.pdf

Hello Chris,

Attached please find the above referenced document. Please call or email me with any questions or concerns.

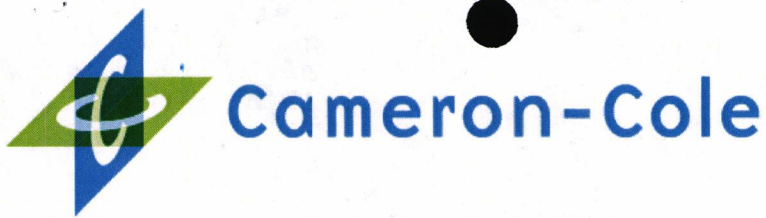
Thanks,

Mike Stephenson  
Principal Scientist  
Cameron-Cole LLC  
50 Hegenberger Loop  
Oakland CA 94621  
office - (510) 777-1864  
mobile - (510) 773-9895

RCRA



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April 30, 2015

Ms. Chris Jump  
U.S. Environmental Protection Agency  
Region VII  
901 North 5th Street  
Kansas City, Kansas 66101

**RE: First Quarter 2015 Progress Report  
Clean Harbors Kansas, LLC  
2549 New York Street, Wichita, Kansas  
EPA Identification No: KSD007246846**

Dear Ms. Jump;

As required by the Clean Harbors Kansas, LLC HSWA, Part II RCRA Permit, Conditions III.S.1. – 6., Clean Harbors Kansas, LLC (Clean Harbors) is providing this quarterly summary progress report covering activities that occurred during the First Quarter 2015. The activities summarized in this report have been conducted pursuant to the corrective action provisions of Permit Condition III. This progress report contains information to comply with following permit conditions:

- III.S.1. A description of all work completed during First Quarter 2015.
- III.S.2. A summary of all findings, including summaries of laboratory data.
- III.S.3. A summary of all problems or potential problems encountered during the reporting period.
- III.S.4. Deviations from the approved work plan(s), SAP's.
- III.S.5. Projected work for the Second Quarter 2015 and,
- III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

III.S.1 During the First Quarter 2015 the following work was completed at the Clean Harbors Kansas Facility.

Re-excavation of the northeastern corner area was performed during First Quarter 2015. The excavation was completed according to the plan submitted to EPA in October 2014.

Excavation of impacted soils within the Phase III and IV areas of the Site was continued during first quarter 2015. A figure depicting the extent of the





excavation work as of March 31, 2015 is attached. The excavation included all areas described under the IRM Work Plan and expanded to encompass a larger area based upon confirmation sample results and the discovery of buried drums in some portions of the Site. A summary of the changes in the dimensions of the excavations is presented below:

- Building B – First Quarter 2015 excavation activities associated with Building B included expanding the excavation southward, encompassing the entire building floor and underlying soils to a depth of 2.5 feet below ground surface. The Building B excavation was also extended westward based upon confirmation sample results and eventually was connected to the paint pit excavation located immediately west of the Former Building B location. The northern extent of the Building B excavation was limited by the water line running east to west through the center of the property and the southern extent was restricted by the presence of a natural gas pipeline running to the south of Building B.
- Paint Pit – Excavation of the paint pit area was completed during First Quarter 2015. After opening the excavation, staining and strong chemical odors were encountered in soils at depths of approximately 10-15 feet bgs. The paint pit excavation was expanded to the north, west and south in response to these observations. The northern and southern extents of the paint pit excavation were limited due to the presence of the water line to the north and the natural gas line to the south. As the paint pit excavation was expanded to the west, buried drums were encountered at depths ranging from 4 to 10 feet below ground surface. A total of approximately 30 buried drums were removed from the paint pit. A summary of the drum findings, including photos and analytical results of the drum contents, was forwarded to EPA via email on March 26, 2015.
- Southwestern Fence Line Area – The southern portion of the southwestern fenceline excavation (the portion on the Coastal Derby refinery property) was completed during First Quarter 2015. No confirmation sample was collected from the floor of the excavation due to groundwater presence. All sidewall sample results were below IAOs.
- Building D/Processing Area – The excavation encompassing Building D and the Processing Area was completed during First Quarter 2015. Three drums that were found in the western portion of the processing area excavation during Fourth Quarter 2014 were removed and additional sampling yielded results for COCs that were below IAOs.





Building C – Excavation of Building C soils was continued during First Quarter 2015. The excavation was completed roughly as described in the IRM work plan initially. The excavation was expanded to the west and south based upon confirmation sample results. The most notable expansion of the Building C excavation was the area south of the water line where elevated COC concentrations dictated the excavation of approximately 2000 cubic yards of soil to depths up to 15 ft. bgs. All final confirmation soil sample results indicated concentrations were below IAOs. The attached figure depicts the Final Building C excavation extent.

Grid sampling – Soil samples were collected from the western portion of the Site to determine if soil stockpiles had potentially impacted underlying soils. These samples were collected throughout First Quarter 2015. Results from the samples collected south of Building C resulted in the excavation described above. All other grid sampling locations indicated concentrations below IAOs. Four additional grid samples will be collected during Second Quarter 2015.

A memo describing the proposed approach to address EPA's concerns on the risk assessment was submitted to EPA for review on March 5, 2015. Upon receipt of comments on this document, the actions described to address risk assessment concerns will be taken.

### III.S.2. A summary of all findings, including summaries of laboratory data.

The attached figure depicts the approximate excavation extent as of March 31, 2015. Because all excavations have been backfilled, summaries of the analytical data will be transmitted in the IRM completion report per discussions with EPA.

### III.S.3. A summary of all problems or potential problems encountered during the reporting period.

Approximately 30 buried drums were discovered west of the paint pit as described above. A summary of the drum findings along with analytical data from the drum contents was transmitted to EPA in March 2015.

### III.S.4. Deviations from the approved work plan(s), SAP's

Sampling of drum contents was not anticipated at the time of the IRM workplan. The procedures, analyte lists and sampling frequency for drum samples collected during First Quarter 2015 was discussed with EPA during a Site visit in March 2015.



### III.S.5. Projected Work for the Second Quarter 2015:

It is anticipated that all excavation and backfill work will be completed during Second Quarter 2015.

Clean Harbors anticipates receipt of comments from EPA on the Phase IV RFI Report during Second Quarter 2015. When received, Clean Harbors will review these comments and respond accordingly.

Clean Harbors anticipates receipt of comments on the proposed approach to address risk assessment concerns during Second Quarter 2015. Once received, Clean Harbors will proceed with addressing these concerns.

A plan to re-establish the monitoring well network at the Site will be developed during Second Quarter 2015. Clean Harbors intends to develop this plan in light of any EPA comments on the Phase IV RFI report which are expected during Second Quarter 2015.

Continued work on the IRM completion report will be performed during Second Quarter 2015. Clean Harbors anticipates submitting this report to EPA for review on or before July 31, 2015, pending receipt and review of comments on previously submitted documents.

### III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

No instances of non-compliance were reported or encountered during the reporting period.

Please do not hesitate to contact me with any questions regarding this report. I can be reached at 510-777-1864 (e-mail: [mstephenson@cameron-cole.com](mailto:mstephenson@cameron-cole.com)).

Sincerely,

Mike Stephenson  
Principal Scientist

cc: John Cook, KDHE  
Akhter Hossain, KDHE  
Mustafa Kamal, KDHE

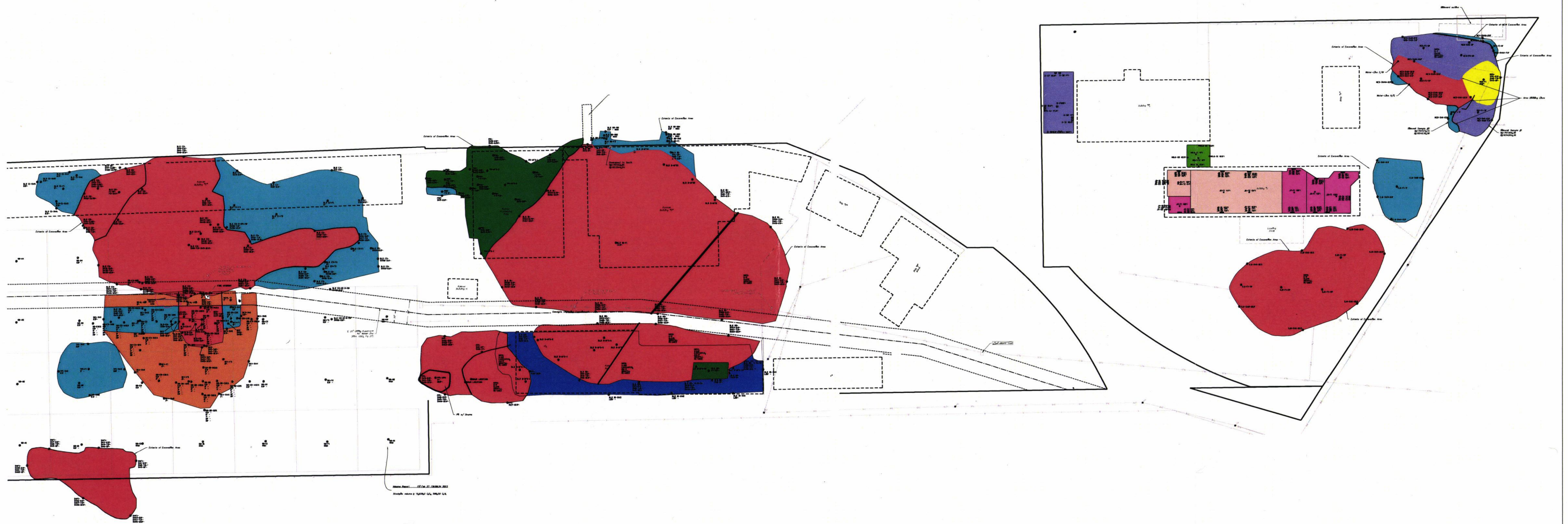




Martin Smith, Clean Harbors  
Lon Stewart, Clean Harbors



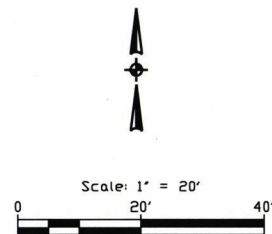




DRAFT

**LEGEND**

- 2' EXCAVATION
- 2.5' EXCAVATION
- 5' EXCAVATION
- 7.5' EXCAVATION
- 8' EXCAVATION
- 10' EXCAVATION
- 12' EXCAVATION
- 12.5' EXCAVATION
- 14' EXCAVATION
- 15' EXCAVATION
- SOIL SAMPLE LOCATION

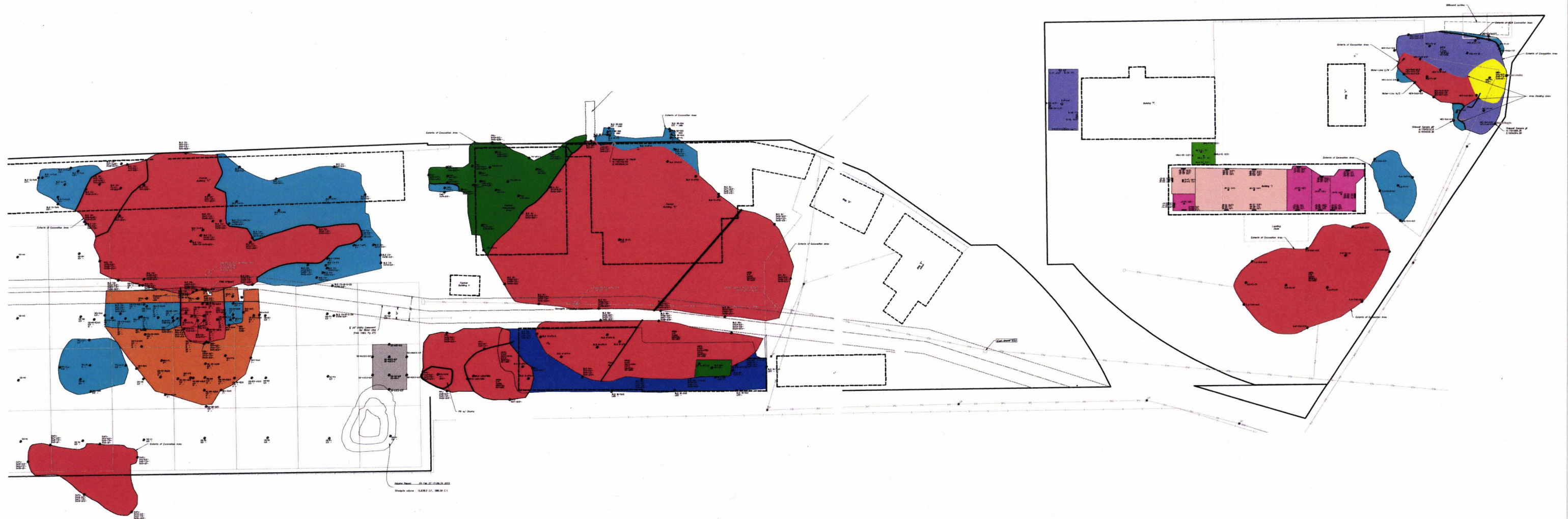


CLEAN HARBORS-WICHITA, KS  
PROJECT NAME

**isi** SITE-WIDE  
SHEET TITLE

B.GERBER PROJECT MGR.	W. JOHNSON DRAWN BY:	SCINAR CHECKED BY:
4-17-2015 DATE	1406010 JOB NO.	1 / 1 SHEET / OF

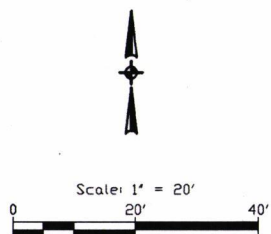




**LEGEND**

- 1' EXCAVATION
- 2' EXCAVATION
- 2.5' EXCAVATION
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- 7.5' EXCAVATION
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- 10' EXCAVATION
- 12' EXCAVATION
- 12.5' EXCAVATION
- 14' EXCAVATION
- 15' EXCAVATION

SOIL SAMPLE LOCATION



**DRAFT**

CLEAN HARBORS-WICHITA, KS  
PROJECT NAME

**SITE-WIDE**  
SHEET TITLE

B.GERBER PROJECT MGR. W.JOHNSON DRAWN BY: S.CINAR CHECKED BY:

6-9-2015 DATE 1406010 JOB NO. 1 / 1 SHEET/OF